

Remarks

Reconsideration of the application and allowance of all pending claims are respectfully requested. Claims 1 and 4-72 remain pending.

Applicants respectfully request that the Examiner carefully consider the remarks presented herewith.

In the Office Action, dated February 17, 2004, claims 1, 4-7, 12-19, 21, 23-29, 34-43, 45-55, 50-69 and 71-72 are rejected 35 U.S.C. 102(b) as being anticipated by Christensen et al. (U.S. Patent No. 6,330,605). Additionally, claims 20, 42 and 68 are rejected under 35 U.S.C. 103(a) as being unpatentable over Christensen. Applicants respectfully, but most strenuously, traverse these rejections for the reasons below.

Applicants' invention is directed, in one aspect, to providing ordered lists of service addresses to client nodes to enable those client nodes to access a service associated with those service addresses. Each ordered list is specifically ordered for that client node based on one or more characteristics of the client node. Thus, different client nodes are given differing ordered lists to diversify how the client nodes access a particular service.

As one example, in independent claim 1, applicants specifically claim wherein the ordered list is ordered specifically for the client node based on one or more characteristics of the client node. Applicants respectfully, but most strenuously, submit that Christensen does not order a list of service addresses specifically for a client node based on one or more characteristics of the client node.

In providing service addresses to a client node, Christensen does not take into consideration the characteristics of the client node. In particular, Christensen does not teach or suggest providing an ordered list of addresses for a client node, in which the list is specifically ordered for that client node based on one or more characteristics of that client node. There is no such teaching or suggestion in Christensen. In the Office Action, support for this rejection is indicated at Col. 4, lines 63-66. In particular, the Office Action states: Christensen teaches

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"based on one or more characteristics of the client node." However, applicants respectfully submit that the teaching at that column has nothing to do with providing an ordered list of service addresses, but instead, deals with authorization to access a service. The authorization described in Col. 4 takes place after the address has been provided to the client. Thus, the authorization has nothing to do with creating an ordered list of service addresses, which the client uses to access the service. Christensen is silent as to using the characteristics of the client node to create an ordered list for that client node. This is simply missing from Christensen.

Further support for this rejection is indicated in the "Response to Arguments" section of the Office Action in which it is stated: "Christensen also teaches basing the request on the characteristic of the client node, specifically authorization (see Col. 4, line 63-66)." Applicants respectfully submit that they are not claiming that the request is based on a characteristic of a client node, but instead, are explicitly claiming that the ordered list is ordered specifically for the client node based on one or more characteristics of the client node. Since the authorization check is performed after the client already has an address to which it sends a request, the authorization is not being used to create the list of addresses. Applicants respectfully submit that Christensen is silent as to creating an ordered list for a client node that is ordered specifically for that client node based on one or more characteristics of the node. Since this is missing from Christensen, applicants respectfully submit that Christensen does not anticipate applicants' claimed invention.

Yet further, it is indicated in the Office Action that the ordered list is ordered specifically for the client node is taught at Col. 5, line 64 – Col. 6, line 15. However, applicants respectfully submit that those sections of Christensen merely teaches how the proxy cache cluster, which front-ends the service of a service provider, is characterized. There are no characteristics listed there for the clients and there are certainly no characteristics listed there that provide an ordered list of service addresses for a client node that is ordered specifically for the client node based on one or more characteristics of the client node.

Based on the foregoing, applicants respectfully submit that claim 1, as well as the other rejected independent claims, are patentable over Christensen. Thus, applicants respectfully

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request an indication of allowability for all independent claims and any claims dependent thereon.

Should the Examiner wish to discuss this case with applicants' attorney, please contact applicants' attorney at the below listed number.

Respectfully submitted,

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